

Managing Excess Flu Vaccine

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What you should do with excess influenza vaccine

Depending on vaccine ingredients, discarded vaccines may be infectious waste, hazardous waste, or non-hazardous solid waste (regular trash).

It is important to manage your discarded vaccines properly even though bulk mercury (the metal) is a bigger threat to the environment; one mercury fever thermometer contains the same amount of mercury (1/2 gram) as 20,000 adult doses of Thimerosal-preserved vaccine.

Vaccines that may be infectious waste when discarded: Vaccines that contain live attenuated virus (only FluMist® in 2004/5) are infectious waste when discarded, according to Gwen Borlaug of the Wisconsin Division of Public Health.

Here are your options for managing excess doses of FluMist® vaccine:

- Return the \$23/dose vaccine to the manufacturer, MedImmune, for proper management. This option has been confirmed with MedImmune. For the \$16/dose vaccine, use the following options.
- Send them to an infectious waste treatment facility for disinfection. (A list of infectious waste transporters is available at www.dnr.state.wi.us/org/aw/wm/faclists) ; or
- Disinfect them yourself according to ss. NR 526.11 and 526.12, Wis. Adm. Code, (www.legis.state.wi.us/rsb/code/nr/nr526.pdf). Be sure to keep records. After disinfection, the vaccine may be managed as regular trash.

Vaccines that may be hazardous waste when discarded: Some flu vaccines (not FluMist®), and some tetanus and meningococcal vaccines, are preserved with 1:10,000 or 0.01 % Thimerosal (see www.vaccinesafety.edu/thi-table.htm). Thimerosal contains about 50% mercury by weight. Vaccines with 1:10,000 or 0.01 % Thimerosal have about 50 mg/L mercury, which exceeds the 0.2 mg/L hazardous waste toxicity characteristic regulatory level for mercury. Discarded Thimerosal-preserved vaccines may need to be managed as D009 hazardous waste, according to state and federal hazardous waste management requirements.

It is illegal to manage Thimerosal-preserved vaccines as infectious waste or non-hazardous solid waste.

Here are your options for managing excess Thimerosal-preserved vaccines:

- Ship unexpired vaccines to the manufacturer for use or proper management (with prior permission from the manufacturer);
- Manage the vaccines under the State of Wisconsin hazardous waste management contract;
- Transport the vaccines to a Wisconsin very small quantity hazardous waste generator (VSQG) collection facility; or
- Contract directly with a hazardous waste management company to manage the vaccines.

Detailed information on these options starts on page 2. Please review the information carefully as all options have conditions and one option is **required** for certain generators.

Vaccines that are non-hazardous solid waste when discarded: Except for live virus vaccines (FluMist®) and for vaccines preserved with Thimerosal, all other vaccines are non-hazardous solid waste when discarded. See the list at (www.vaccinesafety.edu/thi-table.htm for vaccines preserved with Thimerosal) You may manage these other discarded vaccines with your regular trash.

Options for Managing Excess Thimerosal-Preserved Vaccines

Please read these options carefully, as they have conditions and one option is *required* for certain generators.

OPTION 1. Ship Unexpired Vaccines to the Manufacturer for Use or Proper Management (with Prior Permission from the Manufacturer).

Vaccines managed under this option are not regulated in Wisconsin as solid or hazardous waste. To use this option, the vaccines **MUST NOT** be expired. *Expired* Thimerosal-preserved vaccines are regulated as hazardous waste and should be managed under options 2 to 4.

Contact the manufacturer to see if this option is available for your *unexpired* vaccine and under what conditions. We strongly recommend you check into how the manufacturer will manage the returned vaccines to minimize your organization's liability for any environmental contamination caused by managing the vaccines. Shippers should comply with any applicable US Department of Transportation Hazardous Materials Transportation Regulations. For information on those requirements, call (608) 829-7530 or (800) 467-4922.

OPTION 2. Manage the Vaccines under the State of WI Hazardous Waste Management Contract.

All State of WI agencies, institutions and campuses (e.g., UW-Madison and UW System) that do not use option 1 are **required** to use the State contract. Additionally, Wisconsin municipalities **may** use the State contract.

NOTE: "Municipality" is broadly defined at:

<http://vendornet.state.wi.us/vendornet/procman/prod30.asp>

Information on the State contract is available at:

<http://vendornet.state.wi.us/vendornet/asp/ContractDetail.asp?BulletinID=1203>

If you use the State contract and you are a Wisconsin very small quantity hazardous waste generator (VSQG), you may transport your own hazardous waste, without a hazardous waste transportation license, to the contractor. Before considering self-transport, you should get permission from your agency's, institution's or campus' risk management & fleet programs. You also need to comply with the following requirements from the May 1995 WI DNR Interim Guidance for Household & VSQG Hazardous Waste Collection Facilities:

- a) Obtain a receipt from the contractor that includes:
 - i. Your entity's name and generation address, including county,
 - ii. Type of hazardous waste received, hazardous waste code, quantity and units of measure,
 - iii. Date of receipt, and
 - iv. A signed and dated certification statement that reads:

"I, (insert the very small quantity generator's name), certify that I am currently knowledgeable of the hazardous waste regulations as they pertain to my business and certify that the hazardous waste listed was generated by a very small quantity generator of hazardous waste. I further certify that a copy of this receipt shall be kept in the business files at the place of hazardous waste generation for regulatory review for a minimum of three years from this date.", and
- b) Maintain hazardous waste receipts received from the contractor for three years from the date of receipt.

NOTE: VSQG is defined in Guidance (see p. 2 of www.uwex.edu/shwec/Pubs/pdf/720bb9612.pdf) and in Rule [NR 610.07(1)(intro.) & 610.09(1), Wis. Adm. Code at: www.legis.state.wi.us/rsb/code/nr/nr610.pdf].

Transporters should also comply with any applicable US Department of Transportation Hazardous

Materials Transportation Regulations. For information on those requirements, call (608) 829-7530 or (800) 467-4922. While USDOT regulations don't apply to shipments of hazardous materials transported by a government entity in vehicles operated by government personnel for noncommercial purposes, we recommend following those regulations as good management standards.

OPTION 3. Transport the Vaccines to a Wisconsin Very Small Quantity Hazardous Waste Generator (VSQG) Collection Facility

If you are not required to use option 2, you may use this option if:

- a) Your site with the waste vaccines is a VSQG (see option 2),
- b) You (as a Wisconsin VSQG) ship the waste vaccines to a Wisconsin VSQG collection facility, and

NOTE: Contact a VSQG collection facility near you for information on acceptance of hazardous waste and costs for managing it. A list of Wisconsin VSQG collection facilities is available at:

www.uwex.edu/erc/pdf/HHW/VSQGAddress.pdf

- c) If you (as a Wisconsin VSQG) transport your own hazardous waste, without a hazardous waste transportation license, to a Wisconsin VSQG collection facility, you comply with the transportation requirements in option 2.

OPTION 4. Contract Directly with a Hazardous Waste Management Company to Manage the Vaccines

You may use this option if you are not required to use option 2.

A fact sheet titled "Off-site Disposal of Hazardous Wastes: Choosing the Right Treatment, Disposal Facility, and Hazardous Waste Hauler" is available at

www.uwex.edu/ces/ag/sus/sbdc/pdf/tocdt/AB2_4.pdf

A list of licensed Wisconsin hazardous waste transporters is available at

www.dnr.state.wi.us/org/aw/wm/faclists

If you (as a Wisconsin VSQG) transport your own hazardous waste, without a hazardous waste transportation license, to a licensed or approved Wisconsin hazardous waste management facility, you need to comply with the transportation requirements in option 2.

For more information on hazardous waste management requirements:

See Wisconsin's hazardous waste guidance at:

www.dnr.state.wi.us/org/aw/wm/publications

See Wisconsin's hazardous waste management rules at:

www.legis.state.wi.us/rsb/code/nr/nr600.html

Contact the "Other Hazardous Waste Requirements" contact person for the county you are located in, per <http://dnr.wi.gov/org/aw/wm/contacts/regions.htm#county>, or call (608) 266-2111.

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